

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION**

LIGTEL COMMUNICATIONS, INC.,

Plaintiff,

v.

Case No. 1:20-cv-00037-HAB-SLC

BAICELLS TECHNOLOGIES INC.;
BAICELLS TECHNOLOGIES NORTH
AMERICA INC.,

Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Defendants Baicells Technologies Inc. and Baicells Technologies North America Inc. (“Defendants” or “Baicells”) and Plaintiff LigTel Communications, Inc. (“Plaintiff” or “Ligtel”), by and through counsel, hereby stipulate to the entry of and respectfully request that this Court enter the Stipulated Protective Order attached hereto as **Exhibit 1**. In support of this Motion, the Parties state:

1. In this lawsuit, Plaintiff alleges claims under the Lanham Act and claims involving the alleged threatened misappropriation of alleged trade secrets.

2. The parties anticipate that discovery in this matter will involve the possible production of the following categories of commercially sensitive and nonpublic information, as described in the Stipulated Protective Order: (1) trade secrets, (2) financial or business plans or projections, (3) technical information and specifications, (4) information concerning business and marketing strategy, (5) client/customer information and communications, including but not limited to data, statistics, and other information regarding clients/customers, (6) information regarding regulatory compliance, (7) information submitted to any governmental or regulatory

agency, which information is exempt from public disclosure, and (8) other commercially or personally sensitive information.

3. The Parties agree that it is appropriate at this stage to maintain the confidentiality of such information.

4. The Parties agree that the Stipulated Protective Order adequately describes the material that the parties intend to protect as confidential and sets forth the procedures that parties will follow regarding the production and use of confidential information.

5. The requested Stipulated Protective Order is necessary to protect the Parties' confidential information and documents pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and will facilitate the production of information and documents and appropriate protection of confidential information.

WHEREFORE, the Parties move the Court to enter the Stipulated Protective Order attached hereto as Exhibit 1, and for all other necessary and proper relief.

Dated: March 17, 2020

Respectfully submitted,

JENNER & BLOCK LLP

s/ Gabriel K. Gillett

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***Attorneys for Plaintiff LigTel
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Respectfully submitted,

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s/ Adam Arceneaux

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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Adam Arceneaux

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